

The Honorable John C. Coughenour

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

KING COUNTY, a Washington municipal
corporation,

Plaintiff,

v.

ALEX M. AZAR II, in his official capacity
as SECRETARY, U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES; and
the U.S. DEPARTMENT OF HEALTH
AND HUMAN SERVICES,

Defendants.

No. 2:18-cv-00242-JCC

**DECLARATION OF
MICHAEL GEDEON IN SUPPORT OF
PLAINTIFF'S MOTIONS FOR
PRELIMINARY INJUNCTION AND
SUMMARY JUDGMENT**

I, Michael Gedeon, am competent to testify and have personal knowledge of the matters herein:

1. I am the Chief Administrative Officer for Public Health – Seattle & King County (“Public Health” or “the Department”).

2. In that role I oversee the development and management of the Department’s budget and finances.

3. I have worked for Public Health for five years and for 29 years in King County government, including as Criminal Justice Budget Manager in King County’s Central Budget Office, Juvenile Justice Project Manager, and Chief of Administration for the Department of Adult and Juvenile Detention.

1 4. Public Health – Seattle & King County is one of the largest public health agencies
2 in the nation.

3 5. Most of Public Health’s funding sources are categorical, which means they may
4 only be used for specific authorized purposes and cannot be used for other purposes.

5 6. The department’s Public Health Fund is the primary source supporting our core
6 services, including preventing and treating communicable diseases, responding to infectious
7 disease outbreaks, providing critical health services to mothers and children, and developing
8 policy, programs and practices that promote the health and well-being of youth, adults and
9 families.
10

11 7. The Public Health Fund is the source of funding for our Family Life and Sexual
12 Health (“FLASH”) sex education curriculum including staff and overhead costs
13

14 8. Unfortunately, the Public Health Fund lacks dedicated revenue sources that keep
15 up with annual cost of living increases (normal inflation) in support of delivering our core
16 services.

17 9. The Public Health Fund suffers from a “structural gap” in budgeting parlance.

18 10. The Public Health Fund has experienced recurring cycles of deficits over the past
19 15 years which has strained our ability to protect the public’s health.

20 11. At this time, we are projecting an estimated deficit of \$4 million - \$6 million in
21 the 2019-2020 biennial for the Public Health Fund.
22

23 12. King County’s legislative branch, the King County Council, approves a biennial
24 budget for the Public Health Fund and directs some revenue to it from King County’s “general
25 fund”.
26
27

1 13. King County's general fund is likewise chronically underfunded, and has a
2 projected deficit of \$20 million – \$25 million for the next budget in 2019-2020. We expect that
3 many of the county agencies that rely on general fund revenue will have to reduce their costs and
4 services, but do not know presently whether Public Health will receive less general fund revenue
5 that would further exacerbate our deficit.

6
7 14. The early termination of King County's Tier 2 B Teen Pregnancy Prevention
8 Program grant from the U.S. Department of Health and Human Services Office of Adolescent
9 Health is a significant fiscal hardship for Public Health.

10 15. The Public Health Fund relies on grant revenue to fund innovative programs and
11 evaluation research, including the FLASH evaluation.

12 16. Public Health lacks revenue to replace the lost \$2 million without jeopardizing the
13 health of our community by reducing the level of care in our clinics, or our ability to respond to
14 communicable disease outbreaks.

15
16 17. Without finding another source for the \$2 million deficit, Public Health will have
17 no realistic option except to discontinue the research.

18 18. To date, we have not found another source of revenue.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed this 22nd day of March, 2018 in Seattle, Washington.

21
22
23 
24 Michael Gedeon

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of March, 2018, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

DATED this 29th day of March, 2018.

s/ Tricia O'Konek

Tricia O'Konek